

Exhibit B

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Giuffre v. Dershowitz, Case No. 19-CV-3377-LAP

Audio Runtime: 28:57

<p style="text-align: right;">Page 2</p> <p>1 (Beginning of audio recording.)</p> <p>2 MR. DERSHOWITZ: -- talk about your client's</p> <p>3 alleged sexual hang-ups and how he liked his women</p> <p>4 dressed in ways that certainly suggested that they</p> <p>5 have, from her, at least, allegations of sexual</p> <p>6 misconduct, right?</p> <p>7 MR. ZEIGER: There's no question that their</p> <p>8 allegation -- what I refer to as rendezvous -- and</p> <p>9 Sigrid was in one call very graphic. Not specifically</p> <p>10 graphic. I mean, you could have said the same thing</p> <p>11 about anybody, any place any time. But I asked for</p> <p>12 details (indiscernible).</p> <p>13 MR. DERSHOWITZ: Yeah.</p> <p>14 MR. ZEIGER: But I -- it's clear -- it's clear</p> <p>15 that they're trying to get some kind of response from</p> <p>16 us, and our response so far is, yeah, this is</p> <p>17 nonsense, and (indiscernible) we're doing the same</p> <p>18 thing you're doing, Alan, but we haven't heard from</p> <p>19 anybody, yeah.</p> <p>20 MR. DERSHOWITZ: But you say general and</p> <p>21 specific, but my recollection is Sigrid (phonetic) did</p> <p>22 say -- or you tell me that Sigrid did say something</p> <p>23 about how he liked his girls dressed in -- I don't</p> <p>24 know what, negligees or --</p> <p>25 MR. ZEIGER: I think -- I think there was a</p>	<p style="text-align: right;">Page 3</p> <p>1 general reference to the type of lingerie and -- and</p> <p>2 things like that, but no specifics.</p> <p>3 MR. DERSHOWITZ: Right. It sounds like, you</p> <p>4 know, she knows he -- he owns Victoria's Secret, and</p> <p>5 imagines that as a result of that, he must be into the</p> <p>6 kind of lingerie that's sold in the company. But I</p> <p>7 mean, she has a good imagination.</p> <p>8 MR. ZEIGER: She's making -- yes, that's very</p> <p>9 interesting because your -- your indication that Boies</p> <p>10 -- I guess what you say -- tried to convince her that</p> <p>11 her claims are unsustainable?</p> <p>12 MR. DERSHOWITZ: Yeah, that's the word, yeah.</p> <p>13 MR. ZEIGER: Yeah. There seems to be a continual</p> <p>14 pattern of David saying, you know, I know she believes</p> <p>15 it, but maybe she's confused, maybe she's got the</p> <p>16 wrong person, all that kind of stuff. But you're</p> <p>17 hearing the same thing we're hearing.</p> <p>18 MR. DERSHOWITZ: Right.</p> <p>19 MR. ZEIGER: How does a lawyer then proceed with</p> <p>20 a lawsuit in that context?</p> <p>21 MR. DERSHOWITZ: I don't think he can. I don't</p> <p>22 think he can be in the room when she testifies under</p> <p>23 deposition. And I'm giving him only another couple of</p> <p>24 weeks on this thing. Remember now we've stayed any</p> <p>25 request for her to be deposed pending this</p>
<p style="text-align: right;">Page 4</p> <p>1 "investigation". But if I don't hear soon, we're</p> <p>2 going to go to court and, you know, demand a quick</p> <p>3 deposition of her and, you know, obviously question</p> <p>4 her about the details of what she alleges against me.</p> <p>5 We're in a very different situation here. Every</p> <p>6 -- every bad thing that could be said about me has</p> <p>7 been said publicly. It's all false. And so I don't</p> <p>8 care what she says, you know. Let her go on and on</p> <p>9 and on. And the more she says, the more she's lying.</p> <p>10 And you know, we'll catch her and we'll trap her, and</p> <p>11 you know, the next step will be to go to the</p> <p>12 prosecutor and seek a perjury indictment. And you</p> <p>13 know, we're -- we're going to do that if it doesn't</p> <p>14 resolve itself, so.</p> <p>15 MR. ZEIGER: Well, like I said, (indiscernible)</p> <p>16 and I do think it's an unfair and unfortunate</p> <p>17 situation for you and also for my client.</p> <p>18 MR. DERSHOWITZ: Yeah.</p> <p>19 MR. ZEIGER: But it does sound to me like you're</p> <p>20 making progress.</p> <p>21 MR. DERSHOWITZ: Well, I don't know. I mean, I</p> <p>22 don't know. I mean, what I hear about, you know,</p> <p>23 David Boies from all kinds of people who have had</p> <p>24 dealings with him over the years is he's very careful.</p> <p>25 You know, my wife and some of my lawyers are furious</p>	<p style="text-align: right;">Page 5</p> <p>1 with me for having even given him my information about</p> <p>2 where I was in Florida, when, assuming that that will</p> <p>3 somehow end up in her mind, and -- and she'll be able</p> <p>4 to say, oh yeah, it was that day. It was the day you</p> <p>5 came down to argue Bush v. Gore in the Florida Federal</p> <p>6 District Court that you took a detour and came up to</p> <p>7 Palm Beach and had sex with me. She can -- she can</p> <p>8 say that, and we talked about Bush v. Gore. Wow, and</p> <p>9 I was so impressed that you were going to defend the</p> <p>10 Vice President of the United States. Can you imagine</p> <p>11 a whole story being woven around that, especially</p> <p>12 since she already said she saw Gore on the island.</p> <p>13 Gore doesn't even know Epstein. And that she saw</p> <p>14 Clinton on the island. Do you have any information</p> <p>15 about Clinton being on the island at all? Do you know</p> <p>16 anything about that?</p> <p>17 MR. ZEIGER: I don't know anything about either</p> <p>18 of those two gentleman, other than what's been</p> <p>19 (indiscernible) about in the media about Bill Clinton.</p> <p>20 MR. DERSHOWITZ: Yeah. Well, I've spoken to Bill</p> <p>21 Clinton's lawyer, and I've spoken to his first in</p> <p>22 command, the guy who traveled with him, and they're</p> <p>23 positive he was never on the island. Certainly,</p> <p>24 they're not aware he was ever on the island. And</p> <p>25 Gore, I've spoken to his -- one of his people who has</p>

<p style="text-align: right;">Page 6</p> <p>1 spoken to his scheduling secretary, who said that</p> <p>2 Gore's never met Epstein. They're not in each other's</p> <p>3 -- I know -- I know Gore's not in Epstein's Rolodex,</p> <p>4 and Epstein's not in Gore's Rolodex. They never met</p> <p>5 each other, and certainly Gore's never been on that</p> <p>6 island. Remember, the time on the island is only --</p> <p>7 less than a year, period. Because it has to be after</p> <p>8 they left office, January 20th of 2001, and she says</p> <p>9 before she turned 18, which is August 8th that same</p> <p>10 year. So it's only about a six or seven-month period</p> <p>11 that either of them could have been on the island, and</p> <p>12 you know, we're pretty -- pretty definitively certain</p> <p>13 that neither of them ever set foot on that island.</p> <p>14 We're absolutely certain about Gore. And relatively</p> <p>15 certain about Clinton. Of course, Jeffrey Epstein</p> <p>16 swears up and down that Clinton was never on the</p> <p>17 island.</p> <p>18 MR. ZEIGER: Yeah, it's pretty remarkable what</p> <p>19 she's been able to stir up.</p> <p>20 MR. DERSHOWITZ: Oh, it's amazing how one person</p> <p>21 telling lies -- I mean, she's taken six months of my</p> <p>22 life away from me because everything has --</p> <p>23 MR. ZEIGER: Yeah.</p> <p>24 MR. DERSHOWITZ: -- been depositions,</p> <p>25 discoveries, going back to 1998 and getting all of my</p>	<p style="text-align: right;">Page 7</p> <p>1 documentation, findings old passports, you know,</p> <p>2 interviewing people. I mean, it's been as if I'm in</p> <p>3 charge of a major case involving Google v. Facebook.</p> <p>4 That's how involved I've had to become in this thing.</p> <p>5 It's taken over 200 hours of my work. The legal fees</p> <p>6 are about \$760,000. I mean, you know, for --</p> <p>7 obviously for Leslie, that's -- that's small change</p> <p>8 for me. That's my yearly income. So it's -- it's --</p> <p>9 it's been pretty -- pretty draining on me. But I'm</p> <p>10 not going to give up until these lawyers are</p> <p>11 disciplined and until, you know, she's investigated</p> <p>12 for perjury. I'm not satisfied. You know, you can be</p> <p>13 satisfied, and you should be, with just the name not</p> <p>14 coming out. You're satisfied with withdrawal, with</p> <p>15 the status quo remaining. I'm not. I mean, I need to</p> <p>16 make sure that the world knows not only that this was</p> <p>17 irrelevant and impertinent as the judge found but</p> <p>18 perjurious and false.</p> <p>19 MR. ZEIGER: If you can get her to acknowledge</p> <p>20 that it was a mistake. That would be pretty big.</p> <p>21 MR. DERSHOWITZ: I think it's unlikely. My own</p> <p>22 view is that what's going to happen is he's going to</p> <p>23 go to see her. She's going to insist that it's true.</p> <p>24 He's going to say it's unsustainable, and therefore, I</p> <p>25 have to get out of the case, and he'll get out of the</p>
<p style="text-align: right;">Page 8</p> <p>1 case.</p> <p>2 MR. ZEIGER: At which point, she goes back to</p> <p>3 Edwards?</p> <p>4 MR. DERSHOWITZ: Yeah. And Cassell, who are</p> <p>5 complete thugs.</p> <p>6 MR. ZEIGER: Yeah, it's -- it's interesting to me</p> <p>7 that if she acknowledges that she was wrong about you</p> <p>8 after all this, how could he possibly bring a claim</p> <p>9 against anybody else?</p> <p>10 MR. DERSHOWITZ: Of course. Oh, of course. And</p> <p>11 that's clear. I mean, I've been the stalking horse</p> <p>12 for this thing on both sides. I mean, the reason they</p> <p>13 used me, the reason Cassell and Edwards used me --</p> <p>14 Boies claims he didn't know I was going to be</p> <p>15 mentioned, but there was some stuff in the discovery</p> <p>16 that suggests possibly to the contrary. But they</p> <p>17 claim they -- they mentioned me because I helped</p> <p>18 negotiate the deal. But it's obvious that the reason</p> <p>19 they mentioned me is they want to go to people like</p> <p>20 your client and say essentially do you want to be</p> <p>21 Dershowitz'ed. If you don't want to be Dershowitz'ed,</p> <p>22 there are ways around this. But if you don't</p> <p>23 cooperate, we'll do to you what we did to Dershowitz.</p> <p>24 I think it's backfired. I think that having named me</p> <p>25 hurt their credibility, and I think David Boies</p>	<p style="text-align: right;">Page 9</p> <p>1 acknowledges that. He says it was a dumb thing and a</p> <p>2 wrong thing for my name to be mentioned.</p> <p>3 MR. ZEIGER: What I don't understand is if</p> <p>4 they're going to mention your name why not</p> <p>5 (indiscernible) --</p> <p>6 MR. DERSHOWITZ: Yep.</p> <p>7 MR. ZEIGER: -- sue you for damages, and I</p> <p>8 understand you would welcome that. But it just seems</p> <p>9 strange to me that -- that one would go this way,</p> <p>10 unless your theory is correct.</p> <p>11 MR. DERSHOWITZ: Yeah. You know, I'm sure my</p> <p>12 theory is correct. And I was the stalking horse. I</p> <p>13 was the guy who was going to be held out there, if you</p> <p>14 don't want to happen to you what happened to him, you</p> <p>15 have to -- you have to come forward. And -- and the</p> <p>16 more innocent I am, the stronger their claim is</p> <p>17 because, look, if we can do this to Dershowitz, he's</p> <p>18 fighting back and innocent, imagine what we can do to</p> <p>19 your client who's a -- you know, head of a public</p> <p>20 corporation. So you know, it makes sense from an</p> <p>21 extortionist's point of view. Look, I firmly believe</p> <p>22 this all started as an extortion plot. I have on tape</p> <p>23 -- I told you, I'm still not permitted to disclose it,</p> <p>24 but I do have on tape her best friend saying this was</p> <p>25 all aimed at the rich man from Columbus.</p>

<p style="text-align: right;">Page 10</p> <p>1 MR. ZEIGER: Could I at least ask that you take</p> <p>2 good care of that tape?</p> <p>3 MR. DERSHOWITZ: Believe me. Believe me, I have</p> <p>4 taken very good care of it. And I could probably get</p> <p>5 her to say it again. I haven't talked to her now for</p> <p>6 a long time. But I may call her one of these days</p> <p>7 just over the weekend, maybe, and just touch base with</p> <p>8 her and tell her how everything she said is -- turned</p> <p>9 out to be correct. And you know, she volunteered</p> <p>10 that. First I knew about your client was from her.</p> <p>11 And that's when I called you because she said that it</p> <p>12 was this guy and they wanted to have him give --</p> <p>13 either half his wealth or a billion dollars to the</p> <p>14 charity, which they were going to divide three ways --</p> <p>15 the lawyer, the charity, and her.</p> <p>16 MR. ZEIGER: I understand the sensitivity of your</p> <p>17 situation and respect everything you've done vis-a-vis</p> <p>18 us. If there's a way that I can help you get to a</p> <p>19 point that we can at least listen to that tape --</p> <p>20 MR. DERSHOWITZ: Sure. Okay. I -- I -- you're</p> <p>21 first on my list, believe me.</p> <p>22 MR. ZEIGER: Thank you.</p> <p>23 MR. DERSHOWITZ: Epstein wants to listen to it,</p> <p>24 too, and my -- my -- my -- you know, my lawyers are</p> <p>25 telling me that I shouldn't expose it beyond privilege</p>	<p style="text-align: right;">Page 11</p> <p>1 at this point, but the time will come.</p> <p>2 MR. ZEIGER: Are you familiar (indiscernible)</p> <p>3 talking about (indiscernible) are there any other</p> <p>4 people out there being shaken down?</p> <p>5 MR. DERSHOWITZ: Jeffrey tells me about one other</p> <p>6 person. I called --</p> <p>7 MR. ZEIGER: (Indiscernible).</p> <p>8 MR. DERSHOWITZ: Yeah. I called that person, and</p> <p>9 he said no. So I don't know. I know that the</p> <p>10 Guardian, I think it was, called Ehud Barak, and Barak</p> <p>11 said that he would sue them if they published it.</p> <p>12 They didn't publish his name. And Barak is very close</p> <p>13 to Jeffrey Epstein.</p> <p>14 MR. ZEIGER: Is that right?</p> <p>15 MR. DERSHOWITZ: Yeah.</p> <p>16 MR. ZEIGER: Well, (indiscernible) it's awfully</p> <p>17 strange (indiscernible) that of all the people around,</p> <p>18 our client would have been the one -- the only one to</p> <p>19 be directly approached.</p> <p>20 MR. DERSHOWITZ: Well, he has the most money. I</p> <p>21 mean, he's the pot at the end of the rainbow,</p> <p>22 obviously. A lot of advantages in being rich and</p> <p>23 maybe some disadvantages.</p> <p>24 MR. ZEIGER: Yeah.</p> <p>25 MR. DERSHOWITZ: I think that's the only reason I</p>
<p style="text-align: right;">Page 12</p> <p>1 can think of, and that was the only name that the</p> <p>2 woman in Florida mentioned. No name. She didn't know</p> <p>3 the name. But the only person she described. The</p> <p>4 others were all described in very generic terms --</p> <p>5 academics, politicians, businesspeople. But in -- in</p> <p>6 the case of the Columbus man, it was a man from</p> <p>7 Columbus who owns a Limited and Victoria's Secret.</p> <p>8 She knew that. But she didn't know the name. So that</p> <p>9 --</p> <p>10 MR. ZEIGER: Where are we on the -- on the -- the</p> <p>11 television broadcast? You got any sense of that?</p> <p>12 MR. DERSHOWITZ: Well, it's not been -- it hasn't</p> <p>13 been on. I was promised, again -- can you trust ABC?</p> <p>14 I was promised that they would give me advance notice.</p> <p>15 But also the discovery shows that the Cassell and</p> <p>16 Edwards people were pushing ABC to do it. And Cassell</p> <p>17 made himself vulnerable to me for defamation because</p> <p>18 in one of the emails, he says not that my client has</p> <p>19 accused Dershowitz of sexually assaulting her, but he</p> <p>20 says in the email categorically Alan Dershowitz</p> <p>21 sexually assaulted my client. Now, that's an</p> <p>22 independent defamation outside of any litigation</p> <p>23 privilege. So we're going to be taking advantage of</p> <p>24 that.</p> <p>25 MR. ZEIGER: (Indiscernible) Yeah. I mean, I</p>	<p style="text-align: right;">Page 13</p> <p>1 thought he was a pretty smart guy.</p> <p>2 MR. DERSHOWITZ: He's actually a very stupid guy.</p> <p>3 Everybody I know who knows him says he has no common</p> <p>4 sense. He's actually quite dumb. He's academically -</p> <p>5 - you know, he works hard, and he has these academic</p> <p>6 things that have been successful. But nobody I know</p> <p>7 has described him as smart. Everybody I know has</p> <p>8 described Edwards as smart -- shrewd, smart,</p> <p>9 calculating, sleazy, but they've described Cassell as</p> <p>10 naive, kind of -- what do you call those people, the</p> <p>11 academics, the professor who forgets.</p> <p>12 MR. ZEIGER: Yeah.</p> <p>13 MR. DERSHOWITZ: Not a real lawyer. I've heard</p> <p>14 nothing -- nothing positive about his intellect except</p> <p>15 that he was a federal judge, and he was, you know, a</p> <p>16 very strong Republican staffer for Orin Hatch and</p> <p>17 others. But he is not particularly smart. He may</p> <p>18 have a certain kind of intelligence, but common sense,</p> <p>19 hum-um. That's my assessment of him.</p> <p>20 MR. ZEIGER: Do we know why he gave up the</p> <p>21 judgeship?</p> <p>22 MR. DERSHOWITZ: For money.</p> <p>23 MR. ZEIGER: Okay.</p> <p>24 MR. DERSHOWITZ: That's clear. Yeah. And you</p> <p>25 know, he sees this as a source of great funds. All</p>

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1 right.

2 MR. ZEIGER: I hope that one way or another,
3 either your situation resolves itself or
4 (indiscernible).

5 MR. DERSHOWITZ: Yeah. Well, one of those I
6 think will happen. It's hard for me to believe that
7 after what we've shown Boies, Boies could look me in
8 the eye and say I now believe she's telling the truth.
9 I can't -- I can't believe that.

10 MR. ZEIGER: Well, he said remarkable things in
11 my conversations with him about she really believes
12 but maybe she's mistaken. And I -- I've never
13 understood why a lawyer as smart as David Boies would
14 say that to me.

15 MR. DERSHOWITZ: Yeah. Because that's probably
16 in the least-worst scenario. I'm sure he believes
17 she's lying through her teeth, but he can't say that.
18 So what he's saying is she may be mistaken, yeah.

19 MR. ZEIGER: Why even suggest that? Just say --

20 MR. DERSHOWITZ: You know, he told me also --
21 without telling me who he was dealing with, he told me
22 also that there's another case, another matter, and
23 that's what -- I told you about this -- and that was
24 that other lawyer in Washington, and that it may turn
25 out that she is mistaken. And I'm glad his name

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1 for that yet. But I think there may come a time. I
2 mean --

3 MR. ZEIGER: I think -- it seems to me the
4 logical conclusion from all of this is that Boies get
5 out.

6 MR. DERSHOWITZ: Yeah.

7 MR. ZEIGER: Yeah. I don't know that that's
8 necessarily good for you, but it might be better for
9 us because I can't believe Edwards has got the
10 backbone to take us on.

11 MR. DERSHOWITZ: Yeah, I would hope not. But you
12 know, it's moderately me but not as good as another
13 result would be.

14 MR. ZEIGER: Exactly. Exactly. All right, I got
15 to go. Thanks for your time.

16 MR. DERSHOWITZ: Thanks. Be well. Have a good
17 weekend. Take care, bye.

18 MR. ZEIGER: Bye.

19 (End of audio recording.)
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1 hasn't been mentioned yet because the lawyers should
2 have done your -- you know, Cassell and Edwards should
3 have done what I'm doing, checking it out before any
4 names are mentioned. He said that, too, in regards to
5 presumably your client. He didn't mention who it was,
6 obviously.

7 MR. ZEIGER: Right. Well, Alan, thank you, and I
8 hope -- at the appropriate time you can share that
9 tape.

10 MR. DERSHOWITZ: Believe me, I'm anxious to do
11 it, and I will whenever it's -- and I've shared with
12 you the substance of it. So it's pretty clear what --
13 what's on it.

14 MR. ZEIGER: I have to say that like you, if we
15 have a public issue, we are going to be very
16 aggressive, and that would help us be very aggressive,
17 and we --

18 MR. DERSHOWITZ: Yes.

19 MR. ZEIGER: -- (Indiscernible).

20 MR. DERSHOWITZ: Believe me, if you become very
21 aggressive on this, you will have all of my
22 corporation, completely. And I will overrule my
23 lawyers at that point. But I don't think --

24 MR. ZEIGER: Okay.

25 MR. DERSHOWITZ: -- I don't think it's the time

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CERTIFICATE

1
2 I, Wendy Sawyer, do hereby certify that I was
3 authorized to and transcribed the foregoing recorded
4 proceedings and that the transcript is a true record, to
5 the best of my ability.
6
7
8

DATED this 13th day of August, 2020.

WENDY SAWYER, CDLT

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